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8 **Attorney for Plaintiff**

9 **IN THE UNITED STATES DISTRICT COURT FOR THE**
10 **NORTHERN MARIANA ISLANDS**

11 **DONGBU INSURANCE**
12 **COMPANY, Ltd.,**

13 **Plaintiff,**

14 **v.**

15 **OKP (CNMI) CORPORATION**
16 **and JOAQUIN Q. ATALIG,**

17 **Defendants.**

Civil Action No. 08-0002

PLAINTIFF'S INITIAL
DISCLOSURES
PURSUANT TO RULE 26(a)

18 Plaintiff Dongbu Insurance Company, Ltd. ("Dongbu") hereby makes the following
19 initial disclosures pursuant to F.R.C.P. 26(a)(1):

20 A. The name, and if known, address and telephone number of each individual likely to
21 have discoverable information that Dongbu may use to support its case.

22 1. Plaintiff's representatives regarding the coverage requested and the policies
23 issued.

24 2. The individuals identified by the Defendants.

25 B. Documents.

26 1. Complete copies of the applicable insurance policies.


2. Communications between Dongbu and its insured, directly and through counsel.

C. Damages computations. Not applicable to Dongbu, as this is a suit for declaratory relief regarding the parties' rights and obligations under the applicable insurance policies.

D. Insurance agreements. It is Dongbu's understanding that complete copies of the applicable insurance policies it issued are already in the possession of both Defendants; however, Dongbu will work with the parties to ensure that this is correct. Dongbu does not know whether there are other insurance policies issued to the Defendants and/or other related parties from other insurance companies that may be applicable in this case.

Dongbu reserves the right to supplement these disclosures as the case proceeds.

Respectfully submitted this 1st day of May, 2008.



Thomas E. Clifford
Attorney for Plaintiff